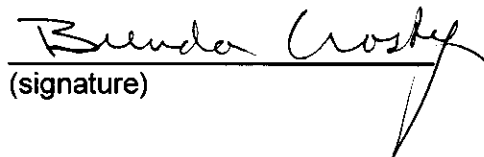


PO BOX 189 Estacada, OR 97023 Tel: (503) 630-4202 Fax: (503) 630-8934

**ANNUAL CERTIFICATE OF COMPLIANCE AS REQUIRED BY SECTION  
64.2009(e) OF THE RULES AND REGULATIONS OF THE FEDERAL  
COMMUNICATIONS COMMISSION**

The undersigned attests and certifies as follows:

1. I am a corporate officer of the Rio Virgin Telephone & Cablevision ("Company").
2. I have personal knowledge that the Company has established and implemented the accompanying Statement of Procedures to ensure compliance with the Rules and Regulations of the Federal Communications Commission regarding Customer Proprietary Network Information.
3. The accompanying copy of the Statement of Procedures explains and demonstrates how our Company's operating procedures ensure compliance with the applicable rules and regulations.

  
(signature)

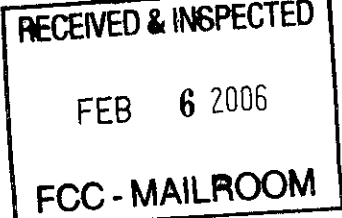
BRENDA CROSBY  
(printed name)

PRESIDENT  
(title)

02/02/06  
(date)

BC/mg

Cc: Bryon McCoy via e-mail [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Harold Oster, Mark Wier



**STATEMENT OF PROCEDURES  
ADOPTED BY RIO VIRGIN TELEPHONE AND CABLEVISION  
TO ENSURE COMPLIANCE WITH THE RULES AND  
REGULATIONS OF THE FEDERAL COMMUNICATIONS  
COMMISSION REGARDING THE PROTECTION OF CUSTOMER  
PROPRIETARY NETWORK INFORMATION ("CPNI")**

Prefatory Statement: Our Company has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with Section 64.2005 of the FCC's Rules and Regulations. We provide our customers notification of their rights with respect to their CPNI and we have adopted the procedures set forth below to ensure our familiarity and compliance with the applicable rules in the event that we subsequently elect to utilize or provide CPNI for any purpose that requires customer approval.

**CPNI Use**

- (1) We recognize that we may use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.
- (2) We understand that we may use, disclose or permit access to CPNI to provide or market service offerings among the categories of service to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we understand that we may share the Customer's CPNI with the affiliate that provides service to the Customer; but if a Customer subscribes to only one service category, we may not share the customer's CPNI with an affiliate without the Customer's approval.
- (3) We understand that we may use, disclose or permit access to CPNI derived from our provision of local exchange or interexchange service for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion, without Customer approval,
- (4) In the absence of Customer approval, we do not use, disclose or permit access to CPNI to provide or market service offerings within a category of service to which the Customer does not already subscribe, except that we understand that we may use, disclose or permit access to CPNI to: (a) provide inside wiring installation, maintenance and repair services; and (b) market, when we provide local service, services formerly known as adjunct-to-basic services such as, but not limited to, speed dialing, computer-provided directory assistance, all monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

- (5) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers. For example, as a local exchange carrier, we do not use local service CPNI to track Customers that call local service competitors.

#### **Required Procedures to Obtain Customer Approval to Use CPNI**

- (1) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, we will obtain approval through written, oral or electronic methods. If we rely on oral approval, we understand we bear the burden of demonstrating that such approval was given in compliance with the CPNI rules. We will honor a Customer's approval or disapproval until the Customer revokes or limits such approval or disapproval. We will maintain all records of Customer approvals for at least one year.

Subject to "opt-out" approval requirements, we understand that we may use a Customer's individually identifiable CPNI to market communications related services to that Customer, and that we may disclose that CPNI to our affiliates that provide communications-related services.

#### **CPNI Notice Requirement Procedures**

- (1) We individually notify and inform each Customer of his or her right to restrict the use or disclosure of, and access to, CPNI. In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, we will solicit approval, and we will maintain records of notification, whether oral, written or electronic, for at least one year.
- (2) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, our notifications will provide information sufficient to enable our Customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI. Our notifications will: (a) contain a statement that the Customer has a right, and we have a duty, under federal law, to protect the confidentiality of CPNI; (b) specify the types of information that constitute CPNI and the specific entities that will receive CPNI, describe the purposes for which the CPNI will be used, and inform the Customer of his or her right to disapprove those uses and deny or withdraw access to CPNI use at any time. With regard to the latter, we will indicate that any approval, or disapproval, will remain in effect until the Customer affirmatively revokes or limits such approval or denial.
- (3) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, we will advise the Customer of the precise steps the Customer must take in order to grant or deny access to CPNI, and we will clearly state that a denial of approval

will not affect the provision of any services to which the Customer subscribes. We understand that in any such notification we may also provide a brief statement, in clear and neutral language, that describes the consequences directly resulting from the lack of access to CPNI. In addition, we understand that we may state that the Customer's consent to use his or her CPNI may enhance our ability to offer products and services tailored to meet the Customer's needs and that we will disclose the Customer's CPNI to any person upon the affirmative written request of the Customer.

- (4) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, our notifications will be comprehensible and not misleading and, if written, will be legible, sufficiently in large type, and placed in an area readily apparent to the Customer. And, if any portion of any such notification is in another language, all portions of the notification will be in that language.
- (5) We will not include in any such notification any statement that attempts to encourage a Customer to freeze third-party access to CPNI.
- (6) For "opt-out" approvals, we understand that our notifications will satisfy items (1) – (5) above. We will not use oral notifications except in the event that a need arises to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether we use "opt-out" or "opt-in" approval based on the nature of the contact. When we use oral notice in this manner, we will comply with items (1) – (5) above, except that, if none of the following situations are relevant to the limited use for which we seek CPNI, we will not: (a) advise Customers, if they have opted out previously, that no action is needed to maintain the "opt-out" election; (b) advise Customers that we may share CPNI with our named or unnamed affiliates or third parties if the limited CPNI usage does not result in use by, or disclosure to, an affiliate or third party; (c) disclose the means by which a Customer can deny or withdraw future access to CPNI, so long as we explain that the scope of the approval is limited to one-time use; and (d) disclose the precise steps a Customer must take to grant or deny access to CPNI, so long as we clearly communicate that the Customer can deny access to his or her CPNI for the call.
- (7) In addition, for "opt-out" approvals, we understand that we must wait at least 30 days after giving Customers notice and an opportunity to opt-out before assuming Customer approval to use, disclose, or permit access to CPNI and notify Customers of the applicable waiting period for a response before approval is assumed. In the event that we utilize the opt-out mechanism, we will provide notices to customers every two years.
- (8) For electronic notifications, we recognize that the waiting period begins to run on the date the notification is sent and, for mail notifications, it begins to run on the third day following the date the notification was mailed. In the event we utilize e-mail to provide opt-out notices, in addition to other requirements, we will: (a) obtain express, verifiable, prior approval to

sending notices by e-mail regarding a Customer's service in general or their CPNI in particular; (b) allow Customers to reply directly to e-mails in order to opt-out; (c) use another means of communicating the notice if the e-mail is returned as undeliverable before considering the Customer to have received notice; and (d) ensure that the subject line in the e-mail clearly and accurately identifies the subject matter of the e-mail.

- (9) In the event that we use "opt-out" approvals, we will also make available to every customer a method to opt-out that is of no additional cost to the Customer and is available 24 hours a day, seven days a week. We may satisfy this requirement through a combination of methods, but we allow Customers to opt-out at no cost and whenever they choose.

### **CPNI Safeguard Procedures**

- (1) As described in this section, we have implemented a system by which the status of a Customer's CPNI approval can be clearly established prior to the use of the CPNI.
- (2) We have trained our personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place.
- (3) We will maintain a record of any instance of our own and our affiliates' sales and marketing campaigns that use Customers' CPNI. In the event that we utilize, disclose, or permit access to CPNI in accordance with a Customer's approval, we will maintain a record of all such instances where CPNI was disclosed or provided to third parties or where third parties were allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. We will retain these records for at least one year.
- (4) We have established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and, in the event that we seek to utilize, disclose or permit access to CPNI for outbound marketing situations,, we will maintain compliance records for at least one year. Specifically, our sales personnel are required to obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI.
- (5) A corporate officer who acts as agent for the Company will sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established these operating procedures adequate to ensure compliance with applicable CPNI rules. This Statement of procedures which sets forth our operating procedures and demonstrates compliance with the CPNI rules, will be maintained together with the compliance certificate.
- (6) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, and we utilize an opt-

out mechanism, we will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly. Any such notice will be provided in the form of a letter that will include our Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether relevant state commission(s) were notified and what action was taken, a copy of any notice provided to customers, and contact information. We will submit any such notice even if other methods by which consumers may opt-out are offered.

#### **REVIEW AND REVISION OF PROCEDURES**

**We shall undertake the responsibility of reviewing these procedures on a continuing basis to ensure compliance with all Rules and Regulations regarding the utilization of CPNI. We shall revise these procedures on a timely basis to reflect any subsequent revisions to the applicable Rules and Regulations addressing CPNI.**



**CASCADE UTILITIES** P.O. Box 189, Estacada, Oregon 97023, Telephone (503) 630-4202  
Fax (503) 630-8974

EB-06-TC-060 / EB-06-36

**CERTIFICATION OF CPNI FILING FEBRUARY 2, 2006**

Marlene H. Dortch, Secretary  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street S.W.  
Washington, D.C. 20554

Dear Secretary Dortch:

In accordance with the Public Notice issued by the Enforcement Bureau on January 30, 2006, please find attached our company's annual compliance certificate for the most recent period as required by section 64.2009(e) of the Commission's Rules together with a statement of our company's operating procedures established to ensure compliance with the Commission's Rules and Regulations regarding Customer Proprietary Network Information.

Should you have any questions regarding this filing, please direct them to the undersigned,

Sincerely,

NAME: BRENDA CROSBY

TITLE: PRESIDENT

BC/mg

Cc: Bryon McCoy via e-mail [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Sue Klaetsh, Bob Thomas, Don Adamson, Bill Randall, Mark Wier



**CASCADE UTILITIES** P.O. Box 189, Estacada, Oregon 97023, Telephone (503) 630-4202  
Fax (503) 630-8974

**ANNUAL CERTIFICATE OF COMPLIANCE AS REQUIRED BY SECTION  
64.2009(e) OF THE RULES AND REGULATIONS OF THE FEDERAL  
COMMUNICATIONS COMMISSION**

The undersigned attests and certifies as follows:

1. I am a corporate officer of the Cascade Utilities, Inc. ("Company").
2. I have personal knowledge that the Company has established and implemented the accompanying Statement of Procedures to ensure compliance with the Rules and Regulations of the Federal Communications Commission regarding Customer Proprietary Network Information.
3. The accompanying copy of the Statement of Procedures explains and demonstrates how our Company's operating procedures ensure compliance with the applicable rules and regulations.

Brenda Crosby  
(signature)

BRENDA CROSBY  
(printed name)

PRESIDENT  
(title)

02/02/06  
(date)

BC/mg

Cc: Bryon McCoy via e-mail [byron.mccoy@fcc.gov](mailto:byron.mccoy@fcc.gov)  
Sue Klaetsh, Bob Thomas, Don Adamson, Bill Randall, Mark Wier

**STATEMENT OF PROCEDURES  
ADOPTED BY CASCADE UTILITIES, INC.  
TO ENSURE COMPLIANCE WITH THE RULES AND  
REGULATIONS OF THE FEDERAL COMMUNICATIONS  
COMMISSION REGARDING THE PROTECTION OF CUSTOMER  
PROPRIETARY NETWORK INFORMATION ("CPNI")**

Prefatory Statement: Our Company has elected not to utilize or provide CPNI for any purpose other than those purposes that are permissible without customer approval in accordance with Section 64.2005 of the FCC's Rules and Regulations. We provide our customers notification of their rights with respect to their CPNI and we have adopted the procedures set forth below to ensure our familiarity and compliance with the applicable rules in the event that we subsequently elect to utilize or provide CPNI for any purpose that requires customer approval.

**CPNI Use**

- (1) We recognize that we may use, disclose or permit access to CPNI to protect our rights and property, our Customers, and other carriers from fraudulent, abusive or unlawful use of, or subscription to, our services.
- (2) We understand that we may use, disclose or permit access to CPNI to provide or market service offerings among the categories of service to which the Customer already subscribes. When we provide different categories of service, and a Customer subscribes to more than one service category, we understand that we may share the Customer's CPNI with the affiliate that provides service to the Customer; but if a Customer subscribes to only one service category, we may not share the customer's CPNI with an affiliate without the Customer's approval.
- (3) We understand that we may use, disclose or permit access to CPNI derived from our provision of local exchange or interexchange service for the provision of CPE and call answering, voice mail or messaging, voice storage and retrieval services, fax store-and-forward, and protocol conversion, without Customer approval,
- (4) In the absence of Customer approval, we do not use, disclose or permit access to CPNI to provide or market service offerings within a category of service to which the Customer does not already subscribe, except that we understand that we may use, disclose or permit access to CPNI to: (a) provide inside wiring installation, maintenance and repair services; and (b) market, when we provide local service, services formerly known as adjunct-to-basic services such as, but not limited to, speed dialing, computer-provided directory assistance, all monitoring, call tracing, call blocking, call return, repeat dialing, call tracking, call waiting, caller ID, call forwarding, and certain Centrex features.

- (5) We do not use, disclose or permit access to CPNI to identify or track Customers that call competing service providers. For example, as a local exchange carrier, we do not use local service CPNI to track Customers that call local service competitors.

#### **Required Procedures to Obtain Customer Approval to Use CPNI**

- (1) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, we will obtain approval through written, oral or electronic methods. If we rely on oral approval, we understand we bear the burden of demonstrating that such approval was given in compliance with the CPNI rules. We will honor a Customer's approval or disapproval until the Customer revokes or limits such approval or disapproval. We will maintain all records of Customer approvals for at least one year.

Subject to "opt-out" approval requirements, we understand that we may use a Customer's individually identifiable CPNI to market communications related services to that Customer, and that we may disclose that CPNI to our affiliates that provide communications-related services.

#### **CPNI Notice Requirement Procedures**

- (1) We individually notify and inform each Customer of his or her right to restrict the use or disclosure of, and access to, CPNI. In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, we will solicit approval, and we will maintain records of notification, whether oral, written or electronic, for at least one year.
- (2) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, our notifications will provide information sufficient to enable our Customers to make informed decisions as to whether to permit the use or disclosure of, or access to, their CPNI. Our notifications will: (a) contain a statement that the Customer has a right, and we have a duty, under federal law, to protect the confidentiality of CPNI; (b) specify the types of information that constitute CPNI and the specific entities that will receive CPNI, describe the purposes for which the CPNI will be used, and inform the Customer of his or her right to disapprove those uses and deny or withdraw access to CPNI use at any time. With regard to the latter, we will indicate that any approval, or disapproval, will remain in effect until the Customer affirmatively revokes or limits such approval or denial.
- (3) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, we will advise the Customer of the precise steps the Customer must take in order to grant or deny access to CPNI, and we will clearly state that a denial of approval

will not affect the provision of any services to which the Customer subscribes. We understand that in any such notification we may also provide a brief statement, in clear and neutral language, that describes the consequences directly resulting from the lack of access to CPNI. In addition, we understand that we may state that the Customer's consent to use his or her CPNI may enhance our ability to offer products and services tailored to meet the Customer's needs and that we will disclose the Customer's CPNI to any person upon the affirmative written request of the Customer.

- (4) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, our notifications will be comprehensible and not misleading and, if written, will be legible, sufficiently in large type, and placed in an area readily apparent to the Customer. And, if any portion of any such notification is in another language, all portions of the notification will be in that language.
- (5) We will not include in any such notification any statement that attempts to encourage a Customer to freeze third-party access to CPNI.
- (6) For "opt-out" approvals, we understand that our notifications will satisfy items (1) – (5) above. We will not use oral notifications except in the event that a need arises to obtain limited, one-time use of CPNI for inbound and outbound customer telephone contacts for the duration of the call, regardless of whether we use "opt-out" or "opt-in" approval based on the nature of the contact. When we use oral notice in this manner, we will comply with items (1) – (5) above, except that, if none of the following situations are relevant to the limited use for which we seek CPNI, we will not: (a) advise Customers, if they have opted out previously, that no action is needed to maintain the "opt-out" election; (b) advise Customers that we may share CPNI with our named or unnamed affiliates or third parties if the limited CPNI usage does not result in use by, or disclosure to, an affiliate or third party; (c) disclose the means by which a Customer can deny or withdraw future access to CPNI, so long as we explain that the scope of the approval is limited to one-time use; and (d) disclose the precise steps a Customer must take to grant or deny access to CPNI, so long as we clearly communicate that the Customer can deny access to his or her CPNI for the call.
- (7) In addition, for "opt-out" approvals, we understand that we must wait at least 30 days after giving Customers notice and an opportunity to opt-out before assuming Customer approval to use, disclose, or permit access to CPNI and notify Customers of the applicable waiting period for a response before approval is assumed. In the event that we utilize the opt-out mechanism, we will provide notices to customers every two years.
- (8) For electronic notifications, we recognize that the waiting period begins to run on the date the notification is sent and, for mail notifications, it begins to run on the third day following the date the notification was mailed. In the event we utilize e-mail to provide opt-out notices, in addition to other requirements, we will: (a) obtain express, verifiable, prior approval to

- sending notices by e-mail regarding a Customer's service in general or their CPNI in particular; (b) allow Customers to reply directly to e-mails in order to opt-out; (c) use another means of communicating the notice if the e-mail is returned as undeliverable before considering the Customer to have received notice; and (d) ensure that the subject line in the e-mail clearly and accurately identifies the subject matter of the e-mail.
- (9) In the event that we use "opt-out" approvals, we will also make available to every customer a method to opt-out that is of no additional cost to the Customer and is available 24 hours a day, seven days a week. We may satisfy this requirement through a combination of methods, but we allow Customers to opt-out at no cost and whenever they choose.

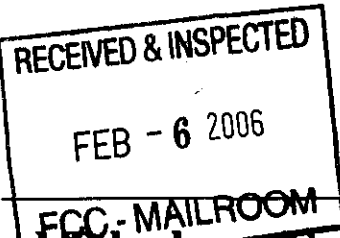
### **CPNI Safeguard Procedures**

- (1) As described in this section, we have implemented a system by which the status of a Customer's CPNI approval can be clearly established prior to the use of the CPNI.
- (2) We have trained our personnel as to when they are, and are not, authorized to use CPNI, and we have an express disciplinary process in place.
- (3) We will maintain a record of any instance of our own and our affiliates' sales and marketing campaigns that use Customers' CPNI. In the event that we utilize, disclose, or permit access to CPNI in accordance with a Customer's approval, we will maintain a record of all such instances where CPNI was disclosed or provided to third parties or where third parties were allowed access to CPNI. The record will include a description of each campaign, the specific CPNI that was used in the campaign, and what products and services were offered as part of the campaign. We will retain these records for at least one year.
- (4) We have established a supervisory review process regarding compliance with the CPNI rules for outbound marketing situations and, in the event that we seek to utilize, disclose or permit access to CPNI for outbound marketing situations,, we will maintain compliance records for at least one year. Specifically, our sales personnel are required to obtain supervisory approval of any proposed outbound marketing request for customer approval of the use of CPNI.
- (5) A corporate officer who acts as agent for the Company will sign a compliance certificate on an annual basis stating that the officer has personal knowledge that the Company has established these operating procedures adequate to ensure compliance with applicable CPNI rules. This Statement of procedures which sets forth our operating procedures and demonstrates compliance with the CPNI rules, will be maintained together with the compliance certificate.
- (6) In the event that we seek to utilize, disclose or permit access to CPNI in an instance where Customer approval is required, and we utilize an opt-

out mechanism, we will provide written notice within five business days to the FCC of any instance where the opt-out mechanisms do not work properly to such a degree that consumers' inability to opt-out is more than an anomaly. Any such notice will be provided in the form of a letter that will include our Company's name, a description of the opt-out mechanism(s) used, the problem(s) experienced, the remedy proposed and when it will be/was implemented, whether relevant state commission(s) were notified and what action was taken, a copy of any notice provided to customers, and contact information. We will submit any such notice even if other methods by which consumers may opt-out are offered.

#### **REVIEW AND REVISION OF PROCEDURES**

**We shall undertake the responsibility of reviewing these procedures on a continuing basis to ensure compliance with all Rules and Regulations regarding the utilization of CPNI. We shall revise these procedures on a timely basis to reflect any subsequent revisions to the applicable Rules and Regulations addressing CPNI.**



**ORIGINAL**

Phone: 319-638-6006  
Phone: 319-638-7001  
Fax: 319-638-5141

**Oran Mutual Telephone Company**

P.O. Box 7 - 5038 Main Street, Oran, Iowa 50664

February 3, 2006

Commission's Secretary, Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: EB-06-TC-060 & EB-06-36, Certification of CPNI Filing 2005**

Dear Ms. Dortch:

This letter serves as our "Certification of CPNI Filing 2005", as ordered in EB-06-TC-060 and EB-06-36.

Our Company has established operating procedures that are adequate to ensure its compliance with the rules in Title 47 - Telecommunications, Section 64.2009. Furthermore I am certifying that I have personal knowledge of these procedures and they are in fact ensuring that our Company is in compliance with the rules in Title 47 - Telecommunications, Section 64.2009.

If you have any questions, please feel free to contact me.

Sincerely,

Joyce Trotter  
Oran Mutual Telephone Company

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau,  
Federal Communications Commission, Room 4-A234, 445 12<sup>th</sup> Street, SW, Washington,  
DC 20554

Best Copy and Printing, Inc., Portals II, 445 12<sup>th</sup> Street, SW, Room CY-B402,  
Washington, DC 20554



**ORIGINAL**

Phone: 319-638-6006

Phone: 319-638-7001

Fax: 319-638-5141

**Oran Mutual Telephone Company**

P.O. Box 7 - 5038 Main Street, Oran, Iowa 50664

*Oran Mutual Telephone Company* (hereinafter referred to as "Company")

Certification of CPNI Filing

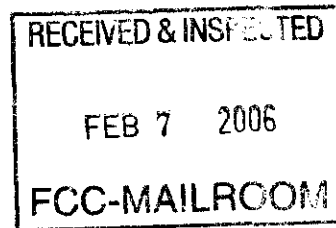
February 3, 2006

1. Company does not use CPNI for marketing purposes.
2. Company personnel are trained as to what information is classified as CPNI and do not use CPNI for Marketing Purposes.
3. The Company has implemented appropriate safeguard policies for CPNI and has documented them in the Company's procedures for training personnel.
4. The Company is submitting the CPNI Compliance Certificate in response to the Public Notice issued by the FCC on February 2, 2006 in DA 06-258, pursuant to Section 64.2009(e) of FCC rules

February 3, 2006

Via Overnight Delivery

Ms. Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> St. SW  
Washington DC 20554



RE: Saturn Telecommunications Services Inc d/b/a STS Telecom  
EB-06-TC-060; Certification of CPNI Compliance filing February 6, 2006

Dear Ms. Dortch:

Enclosed please find the original and four (4) copies of the FCC Certification of CPNI Compliance of (STS Telecom) filed pursuant to 47 CFR Section §64.2009, and Public Notice DA 06-223. No check is enclosed as no remittance fees are due.

Please acknowledge receipt of this filing by date-stamping the extra copy of this cover letter and returning it to me in the self-addressed, stamped envelope enclosed for this purpose.

Please address any inquiries or further correspondence regarding this filing to my attention at 1-954-252-1003

Sincerely,

A handwritten signature in black ink, appearing to read "Keith Kramer", written over a horizontal line.

Keith Kramer  
Executive Vice President  
STS Telecom

Enclosure

cc: Byron McCoy, Telecommunications Consumers Division, Enforcement Bureau  
Federal Communications Commission  
Room 4-A234  
445 12<sup>th</sup> St. SW  
Washington DC 20554

Best Copy and Printing, Inc.  
Portals II  
445 12<sup>th</sup> St. SW  
Washington DC 20554

**Exhibit A**  
**Statement of CPNI Procedures and Compliance**

## Statement of CPNI Procedures and Compliance

Saturn Telecommunications Services Inc. dba STS Telecom Inc. does not use or permit access to CPNI to market any telecommunications or non-telecommunications services. The Company has trained its personnel not to use CPNI for marketing purposes.

Should the Company elect to use CPNI in future marketing efforts, it will follow the applicable rules set forth in 47 CFR Subpart U, including, if necessary, the institution of operational procedures to ensure that notification is provided and customer approval is obtained before CPNI is used or disclosed.

The Company has instituted training procedures and a corresponding disciplinary process to ensure that its personnel understand and comply with restrictions regarding the use and disclosure of, and access to, CPNI. Requests for CPNI by law enforcement agencies are only granted if a subpoena is provided or if the customer provides written permission.

The Company's billing system uses the Company's proprietary billing software, which is encrypted and password protected, and can only be accessed by authorized Company employees.

The Company interfaces with the ILEC pursuant to confidentiality agreements to protect CPNI using password protected software. Only mutually authorized personnel have access to customer service records and such records may only be accessed upon the customer's execution of a Letter of Authorization allowing such access.

The Company maintains a record of all instances where CPNI was disclosed or provided to third parties, or where third parties were allowed access to CPNI.

**OFFICER'S ANNUAL CERTIFICATE OF  
COMPLIANCE WITH CUSTOMER PROPRIETARY NETWORK INFORMATION (CPNI)  
REQUIREMENTS**

I, Keith Kramer, certify and state that:

1. I am the Executive Vice President - Legal and Regulatory of **Saturn Telecommunications Services Inc. dba STS Telecom Inc.** and have personal knowledge of the company's operating procedures as they relate to CPNI, and the Rules and Regulations of the Federal Communications Commission regarding CPNI.
2. I hereby certify that, to the best of my knowledge, information and belief, the company's operating procedures are adequate to ensure compliance with its CPNI obligations pursuant to Section 222 of the Communications Act of 1934, as amended, and the Commission's rules found at 47 CFR Subpart U.
3. A further statement outlining the Saturn's operating procedures and compliance is attached as Exhibit A, as required by 47 C.F.R. §64.2009(e)

  
\_\_\_\_\_  
Keith Kramer, Executive Vice President

\_\_\_\_\_  
Date

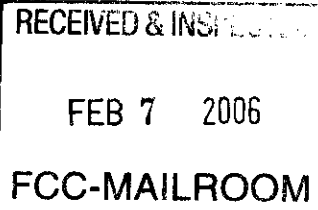
Feb. 3, 2006

**CERTIFICATION OF CPNI FILING FEBRUARY 3, 2006**

**North River Telephone Cooperative**

**REF: EB-06-TC-060**

**CUSTOMER PROPRIETARY NETWORK INFORMATION**



STATE OF VIRGINIA

[CITY/COUNTY] OF Rockingham

I, Myron Rummel declare as follows:

1. I am employed by North River Telephone Cooperative as its General Manager. I am authorized to give this certification on its behalf. This certificate is being given to comply with FCC Rules §64.2009 (e).

2. In compliance with 47 C.F.R. § 64.2001 - § 64.2009, every telecommunications carrier is required to protect from unauthorized disclosure any Customer Proprietary Network Information (CPNI) as defined in Section 222 of the Communications Act of 1934 as amended. Further, every telecommunications carrier is required to have defined procedures in place to protect said information.

3. North River Telephone Cooperative hereby certifies that it has procedures in place to comply with the applicable rules. North River Telephone Cooperative further certifies that it does not engage in marketing or sales activities where CPNI would be utilized.

Myron Rummel  
Name

A handwritten signature in cursive script, appearing to read "Myron Rummel", written over a horizontal line.

General Manager  
Title

North River Telephone Cooperative  
PO Box 236  
Mt. Crawford, VA 22841

STATEMENT OF OPERATIONS  
OF *North River Telephone Cooperative*  
TO ENSURE PROTECTION OF CPNI

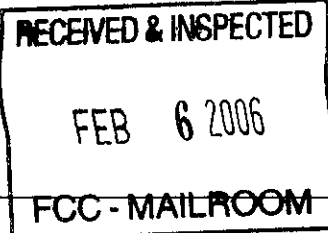
*North River Telephone Cooperative, the company*, has implemented the following safeguards to protect Customer Proprietary Network Information (CPNI) in compliance with FCC rules §64.2001 - §64.2009.

Through its employee training the company ensures that all employees are aware of the privacy of communications requirements incumbent on them.

Employees are only able to access records required by them in the performance of their assigned duties.

Employees that would be engaged in marketing and sales activities would only be allowed to use CPNI as it relates to customer services currently provided by the company to the customer.

The company requires its vendors, suppliers, and service bureaus to certify that CPNI of the company entrusted to them will not be disclosed in violation of the FCC Rules.



February 1, 2006

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: EB-06-TC-060  
Certification of CPNI Filing (February 1, 2006)

Dear Ms. Dortch:

As required in the Public Notice released on January 30, 2006 (DA 06-223), enclosed is the original and four copies of Lemonweir Valley Telephone Company's most recent CPNI Compliance Certification and the accompanying statement explaining how our operating procedures ensure compliance with the rules.

If you have any questions or need any additional information, please contact me.

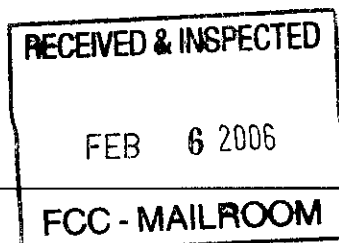
Sincerely,

James M. Costello  
General Manager

Cc: Byron McCoy  
Telecommunications Consumers Division  
Enforcement Bureau  
Federal Communications Commission  
Room 4-A234  
445 12<sup>th</sup> Street SW  
Washington, DC 20554

Interstate Telcom Consulting, Inc.  
130 Birch Ave West  
Hector, MN 55342

Best Copy and Printing, Inc. (BCPI)  
Portals II  
445 12<sup>th</sup> Street SW  
Room CY-B402  
Washington, DC 20554

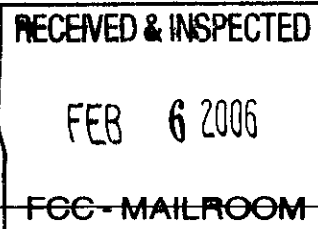


### **Statement of Explanation: CPNI Compliance**

This accompanying statement explains how Lemonweir Valley Telephone Company's operating procedures ensure that we are in compliance with the rules governing CPNI as found in Subpart U - Customer Proprietary Network Information - Part 64 of Title 47 of the Code of Federal Regulations.

Lemonweir Valley Telephone Company adheres to all CPNI rules as stated in Section 64.2001-64.2009 concerning the proper use of our customer's CPNI. Specifically, our notice for CPNI approval meets all requirements as listed in Section 64.2008. To further protect our customer's privacy, we have implemented all safeguards required in Section 64.2009. This includes:

- the training of appropriate personnel as to when they are, and are not, authorized to use CPNI;
- the implementation of an express disciplinary process for CPNI violations;
- the implementation of a system by which the status of a customer's CPNI approval can be clearly established prior to the use of CPNI;
- the maintenance of a record, for at least one year, of our own, and our affiliates' sales and marketing campaigns that use customer CPNI;
- the establishment of a supervisory review process regarding carrier compliance with the federal CPNI rules for outbound marketing situations;
- the establishment of annual certification by a corporate officer to ensure compliance with the federal CPNI rules; and
- the establishment of a procedure to notify the Commission of any instance where the opt-out mechanism did not work properly.



### **Certificate of Compliance: Customer Proprietary Network Information (CPNI)**

This certifies that the undersigned, as a corporate officer of Lemonweir Valley Telephone Company, has personal knowledge that Lemonweir Valley Telephone Company has established operating procedures that are adequate to ensure compliance with the CPNI rules as contained in subpart U - Customer Proprietary Network Information - of Part 64 of Title 47 of the Code of Federal Regulations.

Signature: \_\_\_\_\_

Title: General Manager

Date: July 14, 2005



RECEIVED & INSPECTED

FEB 6 2006

FCC - MAILROOM

February 1, 2006

Marlene H. Dortch  
Office of the Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Re: EB-06-TC-060  
Certification of CPNI Filing (February 1, 2006)

Dear Ms. Dortch:

As required in the Public Notice released on January 30, 2006 (DA 06-223), enclosed is the original and four copies of LVT Corp's most recent CPNI Compliance Certification and the accompanying statement explaining how our operating procedures ensure compliance with the rules.

If you have any questions or need any additional information, please contact me.

Sincerely,

James M. Costello  
President

Cc: Byron McCoy  
Telecommunications Consumers Division  
Enforcement Bureau  
Federal Communications Commission  
Room 4-A234  
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